MEMORANDUM

SUBJECT: Nature and Extent of Contamination for the Gulfco Site

FROM: Susan Roddy

TO: Gary Miller

DATE: March 23, 2009

I have reviewed the Nature and extent of Contamination document in regards to the upcoming ecological risk assessment for the Gulfco site, and have the following comments:

1. Given that comparisons of data were made to both toxicity values and background values, it is hoped that there are no contaminants that are being prematurely dropped but that would need to be carried forward for the risk assessment due to exceedances of toxicity values even if below background values. There is concern with the statements made that the higher value between background values vs. toxicity values was chosen for the comparison (pages 16, 17, and 23). This implies that the background value could trump the toxicity comparison value, and this leave the reviewer with the question of whether contaminants would be dropped prematurely before the risk assessment. It is unclear what is meant by statements that comparisons to toxicity values (PSVs) were subject to comparisons to background values (pages 15 and 23). It is understandable that background comparisons are used to determine extent of contaminations, But, this concern as whether a contaminant exceeding a toxicity value would be prematurely dropped due to emphasis on a background comparison needs to be addressed and clarified. It seems that the starting list of contaminants for risk assessment may extend beyond those listed in the conclusions section of this extent of contamination; if so, this needs to be clarified, and these additional contaminants to be carried forward to risk assessment would need to be identified and compiled.
2. Page 15: Why were only a selected group of metals analyzed? A full suite of metals should at least initially have been analyzed.
3. Page 15: It is not clear whether frequency of detection was justifiably used to determine whether it was warranted to develop site-specific background values for pesticides, SVOCs, antimony, and cadmium. Clarification is needed including the guidance used.